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U.S. DISTRICT COURT
BURLINGTON, VT.

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

CAROL NOVAJOSKY and
MICHAEL N. NOVAJOSKY,

Plaintiffs,

v.

SCHNEIDER NATIONAL, INC.,
SCHNEIDER NATIONAL CARRIERS,
INC., and PAUL ROZON,

Defendants.

1:06-cv-57
CIVIL ACTION NO. 05-2587

NOTICE OF REMOVAL

FILED
SCRANTON

DEC 14 2005

PER

DEPUTY CLERK

TO THE HONORABLE JUDGES IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA:

Defendants, Schneider National, Inc., Schneider National Carriers, Inc. and
Paul Rozon, by and through their attorneys, Rawle & Henderson LLP, respectfully
aver as follows:

1. On November 14, 2005, plaintiffs filed their Complaint against
Schneider National, Inc., Schneider National Carriers, Inc. and Paul Rozon in the

Court of Common Pleas of Luzerne County. A true and correct copy of Plaintiffs' Complaint is attached hereto as Exhibit "A."

2. Counsel for defendants received the Complaint on November 18, 2005. Therefore, this Notice of Removal was filed within the time frame set forth in 28 U.S.C. §1446(b).

3. In their Complaint, plaintiffs demand damages in "an amount in excess of \$50,000." Specifically, plaintiff Carol Novajosky claims damages for "costochondritis, chest contusion, contusions on the stomach, knees and arms, and shock to her nerves and nervous system." See Exhibit "A," ¶11.

4. In addition, plaintiffs demand punitive damages against all defendants. See Exhibit "A," ¶¶ 26 – 29.

5. Accordingly, a fair reading of the Complaint sets forth a claim in which an amount in excess of the jurisdictional limit of \$75,000, exclusive of interests and costs, may be at stake.

6. At all times material hereto, plaintiffs were citizens and residents of Dallas, Pennsylvania.

7. At all times material hereto, defendant, Schneider National, Inc., was a Wisconsin corporation with its principal place of business in Green Bay, Wisconsin.

8. At all times material hereto, defendant, Schneider National Carriers,

Inc., was a Nevada corporation with its principal place of business in Green Bay, Wisconsin.

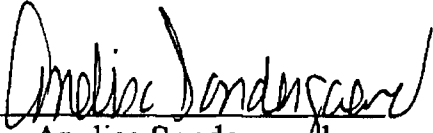
9. At all times material hereto, defendant, Paul Rozon, was a citizen and resident of Chateauguay, Quebec, Canada.

10. Diversity of citizenship within the meaning of 28 U.S.C. §1332 exists between plaintiffs and defendants since they are citizens of different states.

11. Diversity of citizenship existed at the time the action sought to be removed was commenced and continues through the time of filing of this notice, such that defendant is entitled to removal pursuant to 28 U.S.C. §1441, as amended, and 28 U.S.C. §1446.

WHEREFORE, defendants, Schneider National, Inc., Schneider National Carriers, Inc. and Paul Rozon, pray that the above-captioned action now pending in the Court of Common Pleas of Luzerne County be removed therefrom to this Honorable Court.

RAWLE & HENDERSON LLP

By: 
Analisa Sondergaard
Attorney I.D. No. 74223
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Schneider National, Inc.,
Schneider National Carriers, Inc.,
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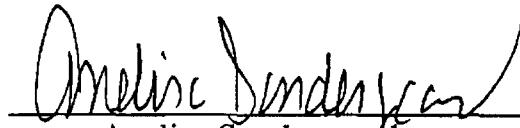
Dated: December 13, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Removal was served upon the below listed counsel by first-class mail, postage prepaid.

Matthew A. Cartwright, Esquire
Munley, Munley & Cartwright
69 Public Square, 12th Floor
Wilkes-Barre, PA 18701

RAWLE & HENDERSON, LLP


Analisa Sondergaard

Dated: December 13, 2005